

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Plaintiffs Fund Texas Choice, The North Texas Equal Access Fund, The Lilith Fund for Reproductive Equity, Frontera Fund, The Afiya Center, West Fund, Jane’s Due Process, Clinic Access Support Network, and Dr. Ghazaleh Moayed, DO, MPH, FACOG,

Plaintiffs,

v.

KEN PAXTON, in his Official Capacity as Attorney General; Susan R. Deski, in her Official Capacity as County Attorney of Burleson County, Texas, and on behalf of a class of all County Attorneys similarly situated; and Julie Renken, in her Official Capacity of District Attorney for Washington County, Texas, Wiley B. “Sonny” McAfee, in his Official Capacity of District Attorney for Blanco, Burnet, Llano, and San Saba Counties, Texas, Jose Garza in his Official Capacity of District Attorney for Travis County, Texas, and Fred H. Weber, in his Official Capacity of District Attorney for Caldwell County, and on behalf of a class of all Texas District Attorneys similarly situated,

Defendants.

Civil Case No. 1:22-cv-00859

APPENDIX IN SUPPORT OF FIRST AMENDED COMPLAINT

Plaintiffs now file their Appendix in Support of their First Amended Complaint. Plaintiffs’

Appendix contains the following documents:

Exhibit A	Freedom Caucus Letter to Sidley Austin
Exhibit B	Courthouse News Service Article

Exhibit C	AG Paxton's Post- <i>Roe</i> Advisory Letter
Exhibit D	Press Release AG Celebrates End of <i>Roe v. Wade</i>
Exhibit E	AG Paxton's 6.28.2022 Tweet
Exhibit F	AG Paxton's 6.30.2022 Press Release Regarding Emergency Motion in Support of Pre- <i>Roe</i> Statutes
Exhibit G	AG Paxton's 7.2.2022 Tweet re: Effectiveness of Pre- <i>Roe</i> Statutes
Exhibit H	AG Paxton's 7.1.2022 Tweet re: Enforceability of Pre- <i>Roe</i> Statutes
Exhibit I	AG Paxton's Petition for Writ to Defend Pre- <i>Roe</i> Statutes in SCOTEX
Exhibit J	AG Paxton's Reply in Support of Petition for Writ to Defend Pre- <i>Roe</i> Statutes in SCOTEX
Exhibit K	Freedom Caucus Tweet re Rep. Cain Letter
Exhibit L	Updated Post- <i>Roe</i> Advisory
Exhibit M	Representative Cain's 3.18.2022 Letter to Lilith Fund
Exhibit N	Representative Cain's 6.28.2022 Tweet
Exhibit O	Representative Cain's First 6.29.2022 Tweet
Exhibit P	Representative Cain's Second 6.29.2022 Tweet
Exhibit Q	Representative Cain's 6.24.2022 Tweet linking Fortune magazine article

Dated: October 11, 2022

Respectfully submitted,

By: /s/ Jennifer R. Ecklund

Jennifer R. Ecklund

Texas Bar No. 24045626

jecklund@thompsoncoburn.com

Elizabeth G. Myers
Texas Bar No. 24047767
emyers@thompsoncoburn.com

Allyn Jaqua Lowell
Texas Bar No. 24064143
alowell@thompsoncoburn.com

John Atkins
Texas Bar No. 24097326
jatkins@thompsoncoburn.com

Elizabeth Rocha
Texas Bar No. 24127242
erocha@thompsoncoburn.com

THOMPSON COBURN LLP
2100 Ross Avenue, Suite 3200
Dallas, Texas 75201
Telephone: 972/629-7100
Facsimile: 972/629-7171

Alexandra Wilson Albright
Texas Bar No. 21723500
aalbright@adjtlaw.com

Marcy Hogan Greer
Texas Bar No. 08417560
mgreer@adjtlaw.com

515 Congress Ave., Suite 2350
Austin, TX 78701-3562
Telephone: 512/482-9300
Facsimile: 512/482-9303

Kevin Dubose
Texas Bar No. 06150500
kdubose@adjtlaw.com
1844 Harvard Street
Houston, TX 77008
Telephone: 713/523-2358
Facsimile: 713/522-4553

Kirsten M. Castañeda

Texas Bar No. 00792401
kcastaneda@adjtlaw.com
8144 Walnut Hill Lane, Suite 1000
Dallas, TX 75231-4388
Telephone: 214/369-2358
Facsimile: 214/369-2359

**ALEXANDER DUBOSE &
JEFFERSON, LLP**

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that this document was filed electronically on October 11, 2022, with the clerk of the Court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court.

/s/ Jennifer R. Ecklund
Jennifer R. Ecklund